

FILED

OCT 25 2021

Trisha Mejia Donnell
2400 Woolner Avenue
Fairfield, CA, 94533
Plaintiff in Pro Per

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY DEPUTY CLERK

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

TRISHA MEJIA DONNELL,

Plaintiff,

vs.

CALIFORNIA HIGHWAY PATROL, et al,
OSS1, MARIAN LINDQUIST AND DOES 1-
50

Defendant

Case No.: 2:21cv 1974
KJM CKD
(PS)

COMPLAINT FOR EMPLOYMENT
DISCRIMINATION

DEMAND FOR JURY TRIAL

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff

Trisha Mejia Donnell
2400 Woolner Avenue
Fairfield, CA 94533

B. The Defendants(s)

California Highway Patrol
3050 Travis Blvd
Fairfield CA 94533

Marian Lindquist, OSS1
21020 Redwood Road
Castro Valley, CA 94546

II Rules for Jurisdiction

A. Title VII of the Civil Rights Act 1964, as codified, 42 U.S.C §§2000e to 2000e -17

1 B. Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

2 C. Other relevant Federal and California Law.

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4 **III Statement of Claim**

5 A. The discriminatory conduct claimed in this action include

6 1. Unequal terms and condition of my employment

7 2. Retaliation

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9 B. The discriminatory acts occurred on a continuous basis during my employment until
10 July 2021 when Ms. Lindquist voluntarily transferred to a different location.

11 C. The discriminatory acts were taken against me based on my disability or perceived
12 disability.

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14 **IV Exhaustion of Federal and State Administrative Remedies**

15 A. I have filed a charge with the Equal Opportunity Commission regarding the
16 defendant's discriminatory conduct on July 16, 2021.

17 B. The Equal Employment Opportunity Commission issued a Notice of Right to Sue
18 letter, which I receive on July 28, 2021. (Exhibit A)

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21 **V Prayer for Relief**

22 B. Lost wages and other compensation denied or lost to Plaintiff by reasons of
23 Defendant's unlawful behavior, in the amount to be proven at trial

24 C. For compensatory damages for Plaintiff's emotional pain and suffering, in an amount
25 to be proven at trial

26 D. For punitive damages, in an amount to be determined at trial
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1 E. For interest on the lost wages, compensation, and damages, including post-judgement
2 interest and an upward adjustment for inflation

3 F. Order enjoining Defendants' from engaging in future acts as mentioned in complaint

4 G. Reasonable attorney fees and other cost related to suit

5 H. For any other further relief as the Court deems appropriate and just.
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7

8 **VI Certification and Closing**

9 A. I certify to the best of my knowledge, information, and belief that this complaint
10 complies with the requirement of Rule 11.

11 B. Plaintiff agrees to provide the Clerk's Office with any changes to my address where
12 case-related papers may be served. I understand that my failure to keep a current address on file with the
13 Clerk's Office may result in the dismissal of my case.
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18 Dated: October 22, 2021

19
20 Respectfully Submitted,

21 *TM Donnell*
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Exhibit A



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

DIRECTOR KEVIN KISH

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EEOC Number: 555-2021-00662C
Case Name: Trisha Mejia Donnell vs. CALIFORNIA HIGHWAY PATROL
Filing Date: July 28, 2021

NOTICE TO COMPLAINANT AND RESPONDENT

This is to advise you that the above-referenced complaint is being dual filed with the California Department of Fair Employment and Housing (DFEH), a state agency, and the United States Equal Employment Opportunity Commission (EEOC), a federal agency. The complaint will be filed in accordance with California Government Code section 12960. The notice constitutes service pursuant to Government Code section 12962.

The EEOC is responsible for the processing of this complaint and the DFEH will not be conducting an investigation into this matter. Please contact EEOC directly for any discussion of the complaint or the investigation.

NOTICE TO COMPLAINANT OF RIGHT TO SUE

This letter is also your state Right to Sue notice. This state Right to Sue Notice allows you to file a private lawsuit. According to Government Code section 12965, subdivision (b), you may bring a civil action under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above- referenced complaint. The lawsuit may be filed in a State of California Superior Court.

Government Code section 12965, subdivision (b), provides that such a civil action must be brought within one year from the date of this notice or, pursuant to Government Code section 12965, subdivision (d)(2), 90 days from receipt of the federal right-to-sue letter from the EEOC, whichever is later. You should consult an attorney to determine with accuracy the date

by which a civil action must be filed. This right to file a civil action may be waived in the event a settlement agreement is signed.

Be advised, the DFEH does not retain case records beyond three years after a complaint is filed.